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February 14, 2025

VIA E-FILING

The Honorable Chief Judge Colm F. Connolly
J. Caleb Boggs Federal Building
844 N. King Street
Unit 31
Room 4124
Wilmington, DE 19801-3555

Re: Emergency Request for Assignment and Scheduling Conference

Dear Chief Judge Connolly:

We write on behalf of Spire Global, Inc. (“Spire”) to respectfully request that the Court (i) promptly assign the case captioned *Spire Global, Inc. v. Kpler Holding SA*, C.A. No. 25-cv-00168-UNA and (ii) set a telephonic scheduling conference on Spire’s pending Motion for Expedited Proceedings (ECF No. 11). Assignment and prompt scheduling of further proceedings are necessary to prevent further irreparable harm to Spire from Defendant Kpler Holding SA’s (“Kpler” or “Defendant”) refusal to consummate the sale of Spire’s maritime business to Kpler pursuant to a November 13, 2024 share purchase agreement (the “SPA”).

As set forth in Spire’s Verified Complaint for Specific Performance (ECF No. 4),¹ Kpler declined to consummate closing on January 24, 2025, the designated closing date under the SPA, in express breach of its obligations under the SPA. Kpler has offered no justification for its failure to close nor identified any unmet conditions to closing, all of which were met or could have been met as of the designated closing date absent Kpler’s breach. Kpler’s ongoing failure to consummate the transaction for over three weeks has already caused significant harm to Spire, and such harm will continue to impact Spire’s business operations for as long as Kpler is allowed to avoid its obligations under the SPA. See, e.g., ECF No. 11 at ¶¶ 36-38.

To prevent Kpler from further causing irreparable harm to Spire and in light of the need for expeditious resolution of Spire’s motion, Spire respectfully requests that this matter be assigned as soon as possible. Pursuant to Federal Rule of Civil Procedure 16(a)(1), Spire further respectfully requests that a telephonic scheduling conference on Spire’s Motion for Expedited

¹ Spire’s Verified Complaint for Specific Performance was initially filed on February 10, 2025 in the Delaware Court of Chancery with a motion to expedite in a litigation captioned, *Spire Global, Inc v. Kpler Holding SA*, C.A. No. 2025-0143-JTL.

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Proceedings be scheduled. In advance of such scheduling conference, Spire respectfully proposes that its Motion for Expedited Proceedings be heard on the following schedule:

- February 19, 2025: Deadline for Defendant to submit any opposition to Spire's Motion for Expedited Proceedings;
- February 20, 2025: Deadline for Spire to submit any reply in further support of Spire's Motion for Expedited Proceedings; and
- February 21, 2025: Hearing on Spire's Motion for Expedited Proceedings.

We thank Your Honor for your attention to this matter and are available to discuss the matters set forth herein at the Court's convenience.

Respectfully submitted,

/s/ Oderah C. Nwaeze

Oderah C. Nwaeze

OCN/cjp

cc: All Counsel of Record (via ECF)